UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

AFFIRMATION OF KEVIN A. LUIBRAND, ESQ.

*Index No.: 1:19-cr-156 (MAD)* 

XIAOQING ZHENG,

Defendant.

KEVIN A. LUIBRAND, ESQ., an attorney licensed to practice law in the courts of the State of New York and in the United States District Court, Northern District of New York, hereby states and affirms the following under penalties of perjury:

- 1. I am the principal attorney of Luibrand Law Firm, PLLC, attorneys to third-party petitioner Hui Jin, and as such, I am fully familiar with the facts and circumstances of this matter.
- 2. I submit this affirmation, with exhibits, and the accompanying memorandum of law and affidavit of Hui Jin, with exhibits, in opposition of the Government's July 28, 2023 motion to dismiss Petitioner's third-party petition ("Petition") pursuant to 21 USC § 852(n), and in support of Petitioner's cross-motion for leave to amend her Petition.
- Annexed hereto as Exhibit "A" is the proposed amended petition with changes to 3. the petition underlined.

Dated: September 18, 2023 Latham, New York

LUIBRÁND LAY FIRM, PLLC

Kevin A. Luibrand, Esq. NDNY Bar No. 102083

Attorneys for Third-Party Petitioner

Hui Jin

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